

July 6, 2001

State of California  
The Resources Agency  
Attn: Ms. Mary D. Nichols, Secretary

Subj: Comment on the Draft Policy on Coastal Erosion Planning and Response

Dear Ms. Nichols:

This letter provides comments on the State Policy on Coastal Erosion Planning and Response. As an avid surfer and professional in the field of beach restoration, I am happy to be able to review the Draft Policy and provide comments. Beaches are a tremendous asset to our state and deserve appropriate devotion of resources. I respect the State's desire to protect this resource and improve the condition of the coast.

The Policy contains many needed elements and in general, I concur with its content. I would, however, suggest that more emphasis be placed on managing the coast from the broader perspective of watersheds and littoral cells rather than by site-specific management strategies. The site-specific strategies are also necessary, but could be the focus of subsequent efforts to augment fundamental large-scale solutions. Other elements not included in the draft policy are consideration sand retention strategies, monitoring of projects, permit streamlining, and funding. Sand retention can improve the cost-effectiveness of beach nourishment without necessarily causing an adverse impact to the environment. Monitoring of projects should be performed in detail to build a database to assist with future planning decisions and project designs. Permit streamlining would serve to prevent projects from becoming bogged down in the regulatory morass. Funding should be committed to make the plan a reality. Each point is addressed below.

#### Management Strategies at the Scale of Watersheds and Littoral Cells Rather Than Site-Specific Strategies.

To my understanding, coastal erosion is caused by a shortage of sand to the system and interruption of its transport along the coast once it arrives. Therefore, long sections of coast are depleted and retreating, leading to a host of site-specific problems. Considering strategies to increase and restore the supply of sediment from rivers and behind dams will alleviate a portion of the problem. Then, maintaining the transport of sand along the coast will result further act to improve conditions. Once these efforts are in effect, regional and local measures can be implemented as appropriate to target specific problem sites or sites presenting the greatest public benefit.

## Sand Retention Strategies

In many cases, beach nourishment is the desired solution to an erosion problem, but the site loses sand so rapidly after being nourished that nourishment is not economically justified. Yet, if an effective sand retention device were installed the beach could remain stable and exist over the long-term. Natural sand retention features are abundant in nature and can serve as the models for man-made measures. Some designs may even provide improved reef habitat at sites that possess either no reef or low quality reef providing an environmental win-win. I strongly suggest leaving the door open to consideration of sand retention in certain cases.

## Monitoring Of Projects

Most projects suffer from a lack of data to justify permit approval decisions. Detailed monitoring of data on sand movement, deposition and environmental effects should be required and possibly partially funded by the State to enable their collection. This would allow more confidence in decision-making for future projects and possible revisions of subsequent project designs to maximize their benefits while minimizing impacts. It could also provide information useful to update and revise this State Policy in the future as needed. A State-wide database could be created for all agency staff and future applicants to access for use.

## Permit Streamlining

Most projects experience difficulties in permitting. This is due to the overlapping jurisdictions along the coast. Agencies sometimes have conflicting objectives and projects can be significantly reduced in scope, scale and effectiveness due to regulatory constraints. Some projects die altogether. Beach projects are outside the definition of most typical development projects, yet still have to be scrutinized as though they are standard development. I suggest effecting a coordinated permit approach amongst State, regional and local agencies for beach nourishment that take into account its atypical need and effects. Inclusion of federal agencies would also be desirable.

## Funding

Finally, from my project experience funding is the most common element lacking in improving beaches and the coast in general. Increased State funding is mandatory if these resources are to be proactively managed. State funding increases our chances of securing federal funding as well. Other States with much less coast commit much more funding to solving this problem than we do.

State Resources Agency  
Comments by Chris Webb  
Page 3

Thank you for the opportunity to comment on this Draft Policy and I look forward to assisting more if possible in the future.

Sincerely,

Chris Webb

C: Brian Baird